IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

THE NATIONAL ORGANIZATION FOR)	
MARRIAGE, INC.)	
Plaintiff,)	
v.)	Civil Action No. 13-1225-JCC-IDD
THE UNITED STATES OF AMERICA,)	
Defendant.)	

Plaintiff National Organization for Marriage's Objections to Defendant United States of America's Amended Exhibit List

Pursuant to this Court's April 15, 2014 Order, Dkt. 64, Plaintiff, the National Organization for Marriage ("NOM") hereby submits its objections to Defendant's Amended Exhibit List, Dkt. 65. Added here are objections to Defendant's new exhibits 136 and 137. All other objections are identical to NOM's initial Objections. (Dkt. 62).

USA Exhibit Numbe r	Production Bates Start	Production Bates End	Description	Objection
			Declaration of	
			Records	
			Custodian	
1	N/A	N/A	HRC	
			Empile hetman	First Amendment Privilege re: names and addresses of Plaintiff's contributors; Statutory Privilege under 26 U.S.C. § 6103 for the same information; Privileged under Fed. R. of Evid. 501 as trade
			Emails between	secrets. Relevancy as
	*****		K. Nix and M.	to specific names of
2	HRC Documents0001	HRC Documents0019	Meisel	donors and specific

ĺ		1	I	amounts contributed
				under Fed. R. Evid.
				401-402. Relevancy as
				to Fed. R. Evid. 403 as
				the probative value of
				the names and
				addresses of donors
				and amounts that they contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is
				substantially
				outweighed by the
				unfair prejudice.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			8/26/2013 NOM	wasting of time, and
3	HRC Documents0009	HRC Documents0111	Email	confusion of the issues.
			Email from R.	
			Koenig to M.	
4	MEISEL0015	MEISEL0015	Meisel	
			Online SEIN	
5	GOV-PROD-0000038	GOV-PROD-0000039	Audit Trail	
6	GOV-PROD-0000044	GOV-PROD-0000046	IRS Printer Logs	
			IRM 3.20.13	
7	GOV-PROD-0002704	GOV-PROD-0002769	dated 1/1/2011	
			Citrix Audit Log	
			Screen Shot -	
			Supplemental	
8	GOV-PROD-0000586	GOV-PROD-0000586	Information.pdf	
			Online SEIN	
			Audit Trail for	
9	GOV-PROD-0000587	GOV-PROD-0000587	ZKNLB	
10	COV PROD 0000500	COV DDOD 0000500	ZKNLB Printer	
10	GOV-PROD-0000588	GOV-PROD-0000590	Usage by User	
11	GOV-PROD-0000591	GOV-PROD-0000592	ZKNLB Printer	
11	00 v - r NOD-0000391	00 v - r KOD-0000392	Event Log ZKNLB All	
12	GOV-PROD-0000593	GOV-PROD-0000593	logons	
12	00 t -t V0D-0000333	00 1-EVOD-0000333	rogons	

Ī		İ	ZKNLB Print	
13	GOV-PROD-0000594	GOV-PROD-0000594	Events 1/21/2011	
			ZKNLB Print	
			Events 1/21/2011	
			including page	
14	GOV-PROD-0000595	GOV-PROD-0000595	count	
15	GOV-PROD-0000636	GOV-PROD-0000637	IRS 3893C letter	
			IRS 3983C letter	
16	GOV-PROD-0000638	GOV-PROD-0000642	macro	
			IRS Form	
1.7	GOV PROP 0000 (12	COLL PROP 0000 (12	4506-A Volumes	
17	GOV-PROD-0000643	GOV-PROD-0000643	For 2009-2014	
18	COV PROD 0000706	COV DDOD 0000700	IDRS ENMOD for NOM	
16	GOV-PROD-0000706	GOV-PROD-0000709	IRM 3.20.13	
19	GOV-PROD-0000710	GOV-PROD-0000777	revision 1/1/2010	
17	33 (TROD-0000/10	33 (TROD-0000777	IRM 3.20.13	
20	GOV-PROD-0000778	GOV-PROD-0000867	revision 1/1/2014	
			Online SEIN	
			Audit Trail by	
21	GOV-PROD-0001344	GOV-PROD-0001345	Tax Year	
			12/12/2013	Hearsay
			Memorandum	
			from J. Archibald	
22	GOV-PROD-0001571	GOV-PROD-0001576	Submission	
			Processing	
			Programs	
			Review IRS Form	
			4506-A (March	
23	GOV-PROD-0001593	GOV-PROD-0001593	2009)	
23	GO V TROD 0001373	GO V TROD 0001373	Instructions for	
			IRS Form	
24	GOV-PROD-0001595	GOV-PROD-0001596	4506-A	
			Peters Training	
25	GOV-PROD-0002121	GOV-PROD-0002121	History 1 B&W	
			Peters Training	
26	GOV-PROD-0002122	GOV-PROD-0002122	History 2 B&W	
25	GOV PROP COSCE	GOVERNOR COSCO	Peters Training	
27	GOV-PROD-0000218	GOV-PROD-0000218	History 1	
28	GOV-PROD-0000219	GOV-PROD-0000219	Peters Training History 2	
20	30 (IROD-000021)	30 (TROD-000021)	1115001 y 2	Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
			NOM Blog -	value of the evidence is
29	GOV-PROD-0002024	GOV-PROD-0002029	12/31/2013	substantially

				outweighed by the prejudice and will lead to undue delay,
				wasting of time, and
				confusion of the issues. Authenticity under
				Fed. R. of Evid. 901;
				Hearsay. Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid. 403 as the probative
				value of the evidence is
				substantially
				outweighed by the prejudice and will lead
				to undue delay,
				wasting of time, and confusion of the issues.
				Authenticity
30	GOV-PROD-0002049	GOV-PROD-0002055	NOM Blog - 11/18/2013	under Fed. R. of Evid. 901.
30	GOV-FROD-0002049	GOV-FROD-0002033	11/16/2013	Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid. 403 as the probative
				value of the evidence is
				substantially
				outweighed by the prejudice and will lead
				to undue delay,
				wasting of time, and confusion of the issues.
				Authenticity
			NOM Blog -	under Fed. R. of Evid.
31	GOV-PROD-0002056	GOV-PROD-0002062	10/3/2013	901. Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead to undue delay,
				wasting of time, and
			NOM Blog	confusion of the issues. Authenticity
32	GOV-PROD-0002063	GOV-PROD-0002064	-12/6/13	under Fed. R. of Evid.

				901; Hearsay.
33	GOV-PROD-0002065	GOV-PROD-0002068	10/9/2013 NY Post Article - To Break the IRS' Wall of Silence	Relevancy, under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 403 as the probative value of the evidence is substantially outweighed by the prejudice and will lead to undue delay, wasting of time, and confusion of the issues. Authenticity under Fed. R. of Evid. 901.
24	CON DROD 000000	COV PROD 0000000		Relevancy, under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 403 as the probative value of the evidence is substantially outweighed by the prejudice and will lead to undue delay, wasting of time, and confusion of the issues. Authenticity under Fed. R. of Evid.
34	GOV-PROD-0002069	GOV-PROD-0002080	NOMFacebook	Relevancy, under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 403 as the probative value of the evidence is substantially outweighed by the prejudice and will lead to undue delay, wasting of time, and confusion of the issues. Authenticity under Fed. R. of Evid. 901: Hearsay
35	GOV-PROD-0002080	GOV-PROD-0002080	NOMFacebook	901; Hearsay. Relevancy, under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 403 as the probative
36	GOV-PROD-0002082	GOV-PROD-0002082	10/4/2013	value of the evidence is

				substantially
				outweighed by the prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
				Authenticity
				under Fed. R. of Evid.
				901.
				Relevancy, under Fed. R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
				Authenticity
27	COV DDOD 0002002	COV DDOD 0002002	NOMFacebook	under Fed. R. of Evid.
37	GOV-PROD-0002083	GOV-PROD-0002083	5/11/2013	901. Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
			NOVE 1 1	Authenticity
38	GOV-PROD-0002084	COV DDOD 0002084	NOMFacebook 6/10/2013	under Fed. R. of Evid. 901.
30	GO Y-F KOD-0002084	GOV-PROD-0002084	0/10/2013	Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially outweighed by the
				prejudice and will lead
				to undue delay,
			NOMFacebook	wasting of time, and
	GOVERNOT SOCIAL	G044 PD 07 33333	MillionDollarMa	confusion of the issues.
39	GOV-PROD-0002086	GOV-PROD-0002086	tch	Authenticity

				under Fed. R. of Evid. 901; Hearsay.
			5081 Security	·
			Approval	
40	GOV-PROD-0002125	GOV-PROD-0002125	2/9/2009	
			5081 Security	
			Approval	
41	GOV-PROD-0002130	GOV-PROD-0002131	2/11/2009	
			5081 Security	
			Approval	
42	GOV-PROD-0002132	GOV-PROD-0002133	2/11/2009 (2nd)	
			TEAM 6 CJE	
			Training	
43	GOV-PROD-0002134	GOV-PROD-0002134	document	
			8/18/2010 Email	
			Thread from C.	
			Peek re: Form	
44	GOV-PROD-0002158	GOV-PROD-0002159	4506-A	
			Email from D.	
			Hamilton to W.	
			Peters re:	
			approval via	
45	GOV-PROD-0002161	GOV-PROD-0002162	5081	
			1/19/2011 email	Hearsay.
			from W. Peters to	
			P. Riley re:	
46	GOV-PROD-0002163	GOV-PROD-0002163	media	
			1/19/2011 email	Hearsay.
			exchange	
			between W.	
			Peters to P. Riley	
47	GOV-PROD-0002164	GOV-PROD-0002165	re: media	
			1/24/2011 email	Hearsay.
			exchange	
			between W.	
			Peters to P. Riley	
48	GOV-PROD-0002166	GOV-PROD-0002166	re: media	
			2/28/2011 email	Hearsay.
			from W. Peters to	
40	GOVERNOR COCCAL T	GOVERNOS COCCAS	P. Riley re:	
49	GOV-PROD-0002167	GOV-PROD-0002167	media	
			3/2/2011 email	Hearsay.
			from W. Peters to	
5 0	COM PROP 00021 10	COLUMNOS COCCASO	P. Riley re:	
50	GOV-PROD-0002168	GOV-PROD-0002168	media	**
			3/2/2011 email	Hearsay.
			exchange	
~ 1	COV PROP 00001 CO	COV DDOD 0002170	between W.	
51	GOV-PROD-0002169	GOV-PROD-0002170	Peters to P. Riley	

			re: media	
			Computer	
52	GOV-PROD-0002171	GOV-PROD-0002171	screenshot	
			3/4/2011 email	Hearsay.
			exchange	
			between W.	
			Peters to P. Riley	
53	GOV-PROD-0002173	GOV-PROD-0002174	re: media	
			3/4/2011 email	Hearsay.
			exchange	
			between W.	
			Peters to P. Riley	
54	GOV-PROD-0002175	GOV-PROD-0002177	re: media	
			3/4/2011 email	Hearsay.
~~	COV PROP 0002170	COV PROP 0002101	exchange	
55	GOV-PROD-0002178	GOV-PROD-0002181	between W.	
			Peters to P. Riley	
			re: media	
56	GOV-PROD-0002339	GOV-PROD-0002348	NOM request for investigation	
30	GOV-FROD-0002559	GOV-FROD-0002348	4/18/2012 email	
			from S. Whitaker	
			to D. Hamilton	
			re: access to	
57	GOV-PROD-0002350	GOV-PROD-0002350	OL-SEIN	
			Excel	
			spreadsheet	
			attachment to	
			GOV-PROD-002	
58	GOV-PROD-0002351	GOV-PROD-0002351	350	
			IRS 3983C letter	
59	GOV-PROD-0002390	GOV-PROD-0002394	macro	
			Doc. re: Plain	
	GOVERNO TO CONTEST	GOVERNO TO CONTENT	Talk About	
60	GOV-PROD-0002403	GOV-PROD-0002434	Ethics	
<i>C</i> 1	CON DDOD 0000445	CON DDOD 0002445	6/17/2013 TEGE	
61	GOV-PROD-0002446	GOV-PROD-0002447	Quality Alert	
			SEIN Background and	
62	GOV-PROD-0002449	GOV-PROD-0002454	Background and History	
02	00 v - r NOD-0002449	00 v - r KOD-0002434	Online 5081	
63	GOV-PROD-0002537	GOV-PROD-0002546	history report	
- 0.5	33 (TROD-000233)	33 (IROD-0002340	W. Peters Time	
64	GOV-PROD-0002477	GOV-PROD-0002481	Entries	
	23 : 1102 0002111	23 : 11:32 3002 101	IRM 10.5.5 dated	
65	GOV-PROD-0002482	GOV-PROD-0002495	8/26/2013	
66	GOV-PROD-0002499	GOV-PROD-0002508	UNAX	

			PowerPoint	
			UNAX	
			PowerPoint	
67	GOV-PROD-0002509	GOV-PROD-0002532	(Extended)	
			W. Peters	
			Performance	
68	GOV-PROD-0002091	GOV-PROD-0002091	Award 8/2009	
			W. Peters	
			Performance	
69	GOV-PROD-0002092	GOV-PROD-0002092	Award 8/2010	
			W. Peters	
			Performance	
			Award 8/2010	
70	GOV-PROD-0002093	GOV-PROD-0002093	(2nd)	
			W. Peters	
			Performance	
			Award 8/2010	
71	GOV-PROD-0002094	GOV-PROD-0002094	(3rd)	
			W. Peters	
			Performance	
72	GOV-PROD-0002095	GOV-PROD-0002095	Award 3/2010	
			1/26/2011 email	
			thread from P.	
			Riley to W.	
73	GOV-PROD-0002533	GOV-PROD-0002536	Peters re: media -	
			request for	
			nonprofit	
			database waiver	
			of fees	
74	GOV-PROD-0002579	COV DDOD 0002505	NOM Form 990	
/4	GOV-PROD-0002379	GOV-PROD-0002595	for 2007	First Amendment
				Privilege re: names and
				addresses of Plaintiff's
				contributors; Statutory
				Privilege under 26
				U.S.C. § 6103 for the
				same information;
				Privileged under Fed.
				R. of Evid. 501 as trade
				secrets. Relevancy as
				to specific names of
				donors and specific
				amounts contributed
				under Fed. R. Evid.
			NOM Amended	401-402. Relevancy as
			Form 990 for	to Fed. R. Evid. 403 as
75	GOV-PROD-0002596	GOV-PROD-0002632	2008	the probative value of

1	ı	ı	1	1
				the names and
				addresses of donors
				and amounts that they
				contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is
				substantially
				outweighed by the
				unfair prejudice.
				First Amendment
				Privilege re: names and
				addresses of Plaintiff's
				contributors; Statutory
				Privilege under 26
				_
				U.S.C. § 6103 for the
				same information;
				Privileged under Fed.
				R. of Evid. 501 as trade
				secrets. Relevancy as
				to specific names of
				donors and specific
				amounts contributed
				under Fed. R. Evid.
				401-402. Relevancy as
				to Fed. R. Evid. 403 as
				the probative value of
				the names and
				addresses of donors
				and amounts that they
				contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is
			NOM Original	substantially
			Form 990 for	•
76	COV DDOD 0002622	COV DDOD 0002664		outweighed by the
76	GOV-PROD-0002633	GOV-PROD-0002664	2008	unfair prejudice.
				First Amendment
				Privilege re: names and
				addresses of Plaintiff's
				contributors; Statutory
				Privilege under 26
				U.S.C. § 6103 for the
				same information;
				Privileged under Fed.
				R. of Evid. 501 as trade
			NOM Farms 000	secrets. Relevancy as
	COLUBBOD 0002	COLUBBOD 0002702	NOM Form 990	to specific names of
77	GOV-PROD-0002665	GOV-PROD-0002703	for 2009	donors and specific

				amounts contributed
				under Fed. R. Evid. 401-402. Relevancy as
				to Fed. R. Evid. 403 as
				the probative value of
				the names and addresses of donors
				and amounts that they
				contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is substantially
				outweighed by the
				unfair prejudice.
			ZKNLB Printer	
			Log Spreadsheet,	
			various dates from 1/21/2011	
78	GOV-PROD-0002547	GOV-PROD-0002547	to 11/28/2011	
			ZKNLB Printer	
			Logs, various	
			dates from	
79	GOV-PROD-0002548	GOV-PROD-0002550	1/21/2011 to 11/28/2011	
17	GO V 1 ROD 0002540	GOV 1 ROD 0002330	5/15/2012 letter	
			from California	
0.0	27027.0404.4	20260404	FPPC to B.	
80	NOM-01314	NOM-01314	Brown Various letters	
			relating to	
			FPPC's	
81	NOM-01316	NOM-01322	investigation	
			6/28/2012 FPPC	
			letter to Z. Kester	
82	NOM-01370	NOM-01375	and various responses	
52	-10112 01070		- coponico	Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
			10/11/2012	to undue delay,
			10/11/2013 NOM email to	wasting of time, and confusion of the issues.
83	NOM-01428	NOM-01432	ActRight	Authenticity

ı	1	1	I	
				under Fed. R. of Evid.
				901; Hearsay.
				Relevancy, under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
			10/4/2013 NOM	Authenticity
			email to	under Fed. R. of Evid.
84	NOM-01433	NOM-01437	ActRight	901; Hearsay.
04	110111-01433	11011-01-37	Activigit	Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
			5/15/2013 NOM	Authenticity
			email to	under Fed. R. of Evid.
85	NOM-01443	NOM-01445	ActRight	901; Hearsay.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
			5/21/2013 NOM	Authenticity
			email to	under Fed. R. of Evid.
86	NOM-01454	NOM-01456	ActRight	901; Hearsay.
				Relevancy under Fed.
				R. of Evid. 401-402
			6/19/2013 NOM	and Fed. R. of Evid.
			email to	403 as the probative
87	NOM-01475	NOM-01477	ActRight	value of the evidence is
J,	1,01,101,10	1.01,1 01 1//	11001015110	. Little of the cylidelice is

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				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
				Authenticity
				under Fed. R. of Evid.
				901; Hearsay.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
			6/5/2013 NOM	Authenticity
			email to	under Fed. R. of Evid.
88	NOM-01483	NOM-01486	ActRight	901; Hearsay.
00	NOWI-01483	NOIVI-01460	Activight	Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
			0.42	confusion of the issues.
			8/27/2013 NOM	Authenticity
			email to	under Fed. R. of Evid.
89	NOM-01516	NOM-01518	ActRight	901; Hearsay.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			9/30/2013 NOM	wasting of time, and
			email to	confusion of the issues.
90	NOM-01524	NOM-01526	ActRight	Authenticity

				under Fed. R. of Evid. 901; Hearsay.
91	NOM-01633	NOM-01649	Eastman Invoices	
71	1\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	1\(\text{OWI-0104}\)	ActRight	
			Invoices	
92	NOM-01654	NOM-01790	(Redacted)	
			ActRight	
93	NOM-01791	NOM-01798	Expenses	
			6/4/2013 J.	
			Eastman	
94	NOM-01815	NOM-01822	Testimony	
95	NOM-01853	NOM-01934	5/17/2013 email from E. Ray to NOM re: IRS hits to date	First Amendment privilege; Relevancy under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 403 as the probative value of the evidence is substantially outweighed by the prejudice and will lead to undue delay, wasting of time, and confusion of the issues; Hearsay.
96	NOM-02070	NOM-02070	7/24/2012 email thread from B. Duggan 7/29/2013 email from E. Ray re:	First Amendment privilege; Relevancy under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 403 as the probative value of the evidence is substantially outweighed by the prejudice and will lead to undue delay, wasting of time, and confusion of the issues; Hearsay. First Amendment privilege; Relevancy under Fed. R. of Evid. 401-402 and Fed. R. of Evid. 401-403 as the probative value of the evidence is substantially
97	NOM-02104	NOM-02105	media strategy	outweighed by the

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				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
				Privileged as Trade
				Secret under Fed. R.
				Evid. 501; Hearsay.
				First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			11/1/2013 email	wasting of time, and
			from E. Ray re:	confusion of the issues;
98	NOM-02110	NOM-02110	Susan Crabtree	Hearsay.
				First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			7/27/2012 email	wasting of time, and
			from B. Duggan	confusion of the issues;
99	NOM-02317	NOM-02317	to B. Dunn (SFC)	Hearsay.
			` /	First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
				substantially
			10/10/2012	outweighed by the
			12/19/2013 email	prejudice and will lead
			from B. Duggan	to undue delay,
			to House staffers	wasting of time, and
			re: USA's	confusion of the issues;
100	NOM-02546	NOM-02547	Answer	Hearsay.

1	İ	İ	I	First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
			10/4/2013 email	substantially
				outweighed by the
			exchange between G.	prejudice and will lead to undue delay,
			Norquist and B.	wasting of time, and
			Brown re:	confusion of the issues;
101	NOM-02558	NOM-02565	lawsuit	Hearsay.
101	11011-02330	110111-02303	1aw suit	Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
			4/6/2012 email	to undue delay,
			thread re: NOM	wasting of time, and
			demands federal	confusion of the issues;
102	NOM-02590	NOM-02597	investigation	Hearsay.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			6/11/2013 email	wasting of time, and
			from B. Brown to	confusion of the issues;
103	NOM-02673	NOM-02675	supporters	Hearsay.
				First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the evidence is
			8/24/2013 email	substantially
			from B. Monge	outweighed by the
			to B. Duggan and	prejudice and will lead
104	NOM-02722	NOM-02722	Fr. Anthony	to undue delay,
107	110111 02122	110111 02122	11.7111111011y	to anduc delay,

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				wasting of time, and confusion of the issues;
				Hearsay. First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of Evid. 403 as the
				probative value of the
				evidence is
				substantially
				outweighed by the
			9/27/2013 email	prejudice and will lead
			re: Oversight	to undue delay,
			Committee to	wasting of time, and
			Investigate NOM	confusion of the issues;
105	NOM-02726	NOM-02729	Donor List Leak	Hearsay.
	-	-		Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
106	NOM-02774	NOM-02780		substantially
100	110111 02114	110111 02700		outweighed by the
				prejudice and will lead
				to undue delay,
			4/12/2012 email	wasting of time, and
			from B. Brown to	confusion of the issues;
			NOMNews	Hearsay. First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			Emails from	wasting of time, and
			NOM re:	confusion of the issues;
107	NOM-02781	NOM-02799	disclosure	Hearsay.
				First Amendment
			0/1/2/0012	privilege; Relevancy
			8/16/2013 email	under Fed. R. of Evid.
			from B. Duggan	401-402 and Fed. R. of
100	NOM 02670	NOM 02676	re: timing of	Evid. 403 as the
108	NOM-03670	NOM-03676	lawsuit	probative value of the

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				evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
				Privileged as trade
				secret under Fed. R.
				Evid. 501. Hearsay.
				First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
			9/29/2013 emails	Privileged as trade
			between E. Ray	secret under Fed. R.
109	NOM-03683	NOM-03684	and B. Duggan	Evid. 501; Hearsay.
107	110111-03003	11011-03004	and D. Duggan	First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
				evidence is
				substantially
			10/2/20121	outweighed by the
			10/2/2013 emails	prejudice and will lead
			from F. Schubert	to undue delay,
			re: Draft NOM v.	wasting of time, and
110	NOM 02607	NOM 02600	IRS Press	confusion of the issues;
110	NOM-03685	NOM-03688	Release	Hearsay.
				First Amendment
				privilege; Relevancy
				under Fed. R. of Evid.
				401-402 and Fed. R. of
				Evid. 403 as the
				probative value of the
			9/2013 email	evidence is
			exchange re: IRS	substantially
111	NOM-03692	NOM-03692	on Monday?	outweighed by the

112	NOM-03700	NOM-03703	ActRight FPPC Invoices Online 5081 Annual	prejudice and will lead to undue delay, wasting of time, and confusion of the issues; Hearsay.
113	GOV-PROD-0002770	GOV-PROD-0002771	Recertification On-Line SEIN	
114	GOV-PROD-0002772	GOV-PROD-0002777	User Guide	
			NOM Amended Form 990 for	First Amendment Privilege re: names and addresses of Plaintiff's contributors; Statutory Privilege under 26 U.S.C. § 6103 for the same information; Privileged under Fed. R. of Evid. 501 as trade secrets. Relevancy as to specific names of donors and specific amounts contributed under Fed. R. Evid. 401-402. Relevancy as to Fed. R. Evid. 403 as the probative value of the names and addresses of donors and amounts that they contributed will lead to undue delay, wasting of time, confusion of the issues, and is substantially outweighed by the
115	GOV-PROD-0002778	GOV-PROD-0002814	2010	unfair prejudice. First Amendment
116	GOV-PROD-0002815	GOV-PROD-0002848	NOM Original Form 990 for 2010	Privilege re: names and addresses of Plaintiff's contributors; Statutory Privilege under 26 U.S.C. § 6103 for the same information; Privileged under Fed. R. of Evid. 501 as trade secrets. Relevancy as

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				to specific names of
				donors and specific
				amounts contributed
				under Fed. R. Evid.
				401-402. Relevancy as
				to Fed. R. Evid. 403 as
				the probative value of
				the names and
				addresses of donors
				and amounts that they
				contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is
				substantially
				outweighed by the
				unfair prejudice.
				First Amendment
				Privilege re: names and
				addresses of Plaintiff's
				contributors; Statutory
				Privilege under 26
				U.S.C. § 6103 for the
				same information;
				Privileged under Fed.
				R. of Evid. 501 as trade
				secrets. Relevancy as
				to specific names of
				donors and specific
				amounts contributed
				under Fed. R. Evid.
				401-402. Relevancy as
				to Fed. R. Evid. 403 as
				the probative value of
				the names and
				addresses of donors
				and amounts that they
				contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is
				substantially
			NOM Form 990	outweighed by the
117	GOV-PROD-0002849	GOV-PROD-0002884	for 2011	unfair prejudice.
11/	30 1-1 ROD-0002043	30 Y-1 ROD-0002004	101 2011	First Amendment
				Privilege re: names and
				addresses of Plaintiff's
			NOM Forms 000	
110	COV DDOD 0002007	COV DDOD 000000	NOM Form 990	contributors; Statutory
118	GOV-PROD-0002885	GOV-PROD-0002922	for 2012	Privilege under 26

				H C C 8 (102 f 4
				U.S.C. § 6103 for the
				same information;
				Privileged under Fed.
				R. of Evid. 501 as trade
				secrets. Relevancy as
				to specific names of
				donors and specific
				amounts contributed
				under Fed. R. Evid.
				401-402. Relevancy as
				to Fed. R. Evid. 403 as
				the probative value of
				the names and
				addresses of donors
				and amounts that they
				contributed will lead to
				undue delay, wasting
				of time, confusion of
				the issues, and is
				substantially
				outweighed by the
				unfair prejudice.
			Document	uman prejudice.
			enclosure cover	
110	V 2 11 2 2 11 11 11 11 11 11 11 11 11 11	V a maga #000001		
119	Karger000001	Karger000001	letter	Dalaman and La E. I
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
400			Karger Form	wasting of time, and
120	Karger000004	Karger000005	4506-As	confusion of the issues.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			Form 4506-A	wasting of time, and
121	Karger000089	Karger000089	email	confusion of the issues.
			Karger 3983C	Relevancy under Fed.
122	Karger000017	Karger000037	letters	R. of Evid. 401-402

	ı	1	1	1
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
				wasting of time, and
				confusion of the issues.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			Karger 2007	wasting of time, and
123	Karger000071	Karger000087	NOM Form 990	confusion of the issues.
123	Kargerooorr	Kargeroooo	NOM Pollii 990	Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			Karger 2008	wasting of time, and
124	Karger000327	Karger000356	NOM Form 990	confusion of the issues.
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
				outweighed by the
				prejudice and will lead
				to undue delay,
			NOM 501(c)(4)	wasting of time, and
125	Karger000038	Karger000070	Application	confusion of the issues.
			^^	First Amendment
				Privilege re: names and
				addresses of Plaintiff's
				contributors; Statutory
			Karger FPPC	Privilege under 26
			Complaint (incl.	U.S.C. § 6103 for the
126	Karger000167	Karger000205	Supp.)	same information;
			1 ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	

			EDDC M. 20	Privileged under Fed. R. of Evid. 501 as trade secrets. Relevancy as to specific names of donors and specific amounts contributed under Fed. R. Evid. 401-402. Relevancy as to Fed. R. Evid. 403 as the probative value of the names and addresses of donors and amounts that they contributed will lead to undue delay, wasting of time, confusion of the issues, and is substantially outweighed by the unfair prejudice. Hearsay.
			FPPC May 28, 2012 Letter to	
127	Karger000124	Karger000124	Karger	
			FPPC Dec. 18,	
			2013 Letter to	
128	Karger000123	Karger000123	Karger	
			Supplemental	
			document	
129	Karger000326	Karger000326	enclosure letter	
			Plaintiff's Oct. 3,	
			2013 Verified	
130	N/A	N/A	Complaint and all exhibits	
130	11/71	11/71	Plaintiff's	
			January 21, 2014	
			Discovery	
			Responses to	
			USA First Set of	
131	N/A	N/A	Discovery	
			Plaintiff's Feb.	
			12, 2014	
122	NI/A	NI/A	Supplemental	
132	N/A	N/A	Discovery Responses to	
			USA First Set of	
			Discovery	
<u> </u>				l I
133	N/A	N/A	Plaintiff's Mar.	

	1		Discovery	
			Responses to	
			USA Second Set	
			of Discovery	
			Plaintiff's	
			26(a)(1)	
			Disclosures dated	
134	N/A	N/A	12/20/2013	
			Plaintiff's	
			26(a)(1)	
			Supplemental	
			Disclosures	
135	N/A	N/A	2/21/2014	
			Plaintiff's	
			Supplemental	
			Response to	
			Defendant's	
			Second Set of	
			Requests for	
			Admission and	
			Interrogatories to	
			Plaintiff, dated	
136	N/A	N/A	4/1/2014.	
				Relevancy under Fed.
				R. of Evid. 401-402
				and Fed. R. of Evid.
				403 as the probative
				value of the evidence is
				substantially
			Plaintiff's direct	outweighed by the
			mail fundraising	prejudice and will lead
			documents	to undue delay,
			produced along	wasting of time, and
			with USA	confusion of the issues;
137	NOM-04039	NOM-04064	Exhibit 136	Hearsay.

NOM reserves the right to amend the objections above based on the Court's Orders regarding pretrial motions.

Respectfully submitted this 24th day of April, 2014.

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* Admitted Pro Hac Vice

Certificate of Service

I hereby certify that on April 24, 2014, I served the foregoing Plaintiff's Objections to Defendant's Amended Exhibit List on all registered users via CM/ECF including the following:

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